

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 2:25-MJ-80
	)	
GAO JIAN,	)	
Defendant.	)	

**MOTION FOR DETENTION**

The United States of America, by and through its attorney, Michael P. Drescher, Acting United States Attorney for the District of Vermont, and moves for the pretrial detention of defendant Gao JIAN pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. JIAN is eligible for detention because the case involves a serious risk that he will flee. *See* 18 U.S.C. § 3142(f)(2)(A). If the Court determines that this case does not present a serious risk of flight pursuant to 18 U.S.C. § 3142(f)(2)(A), the Court should order the defendant's temporary detention pursuant to 18 U.S.C. § 3142(d). The defendant is not a citizen of the United States and not a lawfully admitted permanent resident, and the defendant may flee. Therefore, temporary detention is appropriate pending coordination with immigration officials.

2. Reason For Detention. The Court should detain JIAN because there is no condition of or combination of conditions of release that will reasonably assure JIAN's appearance as required. JIAN entered the United States illegally, is not a citizen of the United States, and has no apparent ties to the District of Vermont. The charge against him, and the penalty it carries, provides JIAN with an incentive to flee.

3. Rebuttable Presumption. No rebuttable presumption applies in this matter.

4. Time For Detention Hearing. The United States requests that the Court conduct the detention hearing at the defendant's initial appearance.

Respectfully submitted,

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Acting United States Attorney

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